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September 5, 2023

Honorable James K. Bredar  
Chief United States District Judge  
101 W. Lombard Street  
Baltimore, Maryland 21201

**Re: United States v. Sean Rondell Bundy**  
**Case No. JKB-08-0226**

Dear Judge Bredar:

On June 2, 2023, undersigned counsel requested a 90-day extension of time in which to submit appropriate pleadings or a status report in this case. ECF 475. The Court granted this request the same date. ECF 477.

Counsel has submitted a long-awaited emergency motion for a sentence reduction pursuant to 18 U.S.C. 3582(c) on August 24, 2023.

By Order dated April 4, 2023, at ECF 473, the Court granted Mr. Bundy's request to appoint counsel in his seeking relief pursuant to Rule 36 and 18 U.S.C. 2255 for issues related to, but of different legal origins as the submission filed on August 24, 2023.

Counsel purposely had chosen to address the 3582(c) matter before addressing the Rule 36 and 18 U.S.C. 2255 matters that seem to have been extensively litigated before this Court as well in the Fourth Circuit.

As the Court is aware, Mr. Bundy takes the position that he has not waived his right, with the filing of the recent submission, to have counsel address those other two matters.

Counsel requests a 60-day extension in which to address the remaining issues ordered by the Court.

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AUSA Adeyemi Adenrele, now appointed to this case, has no objection to this request.

Respectfully Submitted,

/s/Gerald C. Ruter

Gerald C. Ruter

Filed by ECF  
Cc: Mr. Sean Bundy